

**FORM TO BE USED BY A PRISONER IN FILING A CIVIL RIGHTS COMPLAINT**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

(1) Jonathan A. Brownlee III :  
 (Name of Plaintiff) (Inmate Number) :  
 Lackawanna County Prison :  
 1371 N. Washington Ave. Scranton, PA 18509 :  
 (Address) :

(2) \_\_\_\_\_ :  
 (Name of Plaintiff) (Inmate Number) :  
 \_\_\_\_\_ :  
 (Address) :

(Each named party must be numbered,  
and all names must be printed or typed)

vs.

(1) United States of America :  
 (2) Unknown Creators of the Meagan's Law registering system :  
 (3) \_\_\_\_\_ :  
 (Names of Defendants) :

(Each named party must be numbered,  
and all names must be printed or typed)

TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS  
☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

**I. PREVIOUS LAWSUITS**

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

3:18-cv-1428

(Case Number)

**CIVIL COMPLAINT**

**FILED  
SCRANTON**

JUL 18 2018

PER [Signature]  
DEPUTY CLERK

**II. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ☒ Yes ☐ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ☐ Yes ☒ No
- C. If your answer to "B" is Yes:

1. What steps did you take? \_\_\_\_\_

2. What was the result? \_\_\_\_\_

- D. If your answer to "B" is No, explain why not: In prison administrative remedies and grievance procedures DO NOT apply to this claim

**III. DEFENDANTS**

(1) Name of first defendant: United States of America

Employed as \_\_\_\_\_ at \_\_\_\_\_

Mailing address: \_\_\_\_\_

(2) Name of second defendant: Creators of the Meagan's Law registering system

Employed as \_\_\_\_\_ at \_\_\_\_\_

Mailing address: \_\_\_\_\_

(3) Name of third defendant: \_\_\_\_\_

Employed as \_\_\_\_\_ at \_\_\_\_\_

Mailing address: \_\_\_\_\_

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

**IV. STATEMENT OF CLAIM**

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. The Meagan's Law registering system was created and brought into effect in error and as a result the system is faulty and currently operating in error —

2. This is because those who are required to register an employment status change to non-employed who are resigning are vulnerable to unnecessary imprisonment. See: Extra Sheets attached

3.

#### V. RELIEF

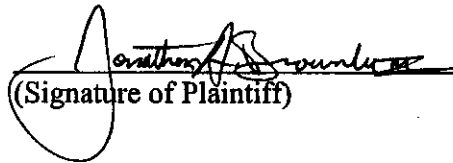
(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. I request money (punitive) damages in the amount of \$100 million dollars, and
2. I request a judgement to be made which causes (me,) the Plaintiff to no longer be required to participate in Megan's Law registering permanently.
3. I request a change be made to the Megan's Law registering system so those resigning are not vulnerable to unnecessary imprisonment, and I request law enforcement to require documented

~~proof employment has terminated prior to filing charges~~

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24<sup>th</sup> day of June, 2018.

  
(Signature of Plaintiff)

Extra Sheets

Jonathan A. Brownlee III vs Meagun's Law

For employees who are resigning/in the process of resigning, their employment does not legally terminate until the approximate date and time a document is signed which legally terminates their employment, even if the document has retroactive effects to their employment status.

Different company offices in other locations than the resigning employee's work home location that he/she worked at, are able to provide documented proof upon request to law enforcement of an employee's employment status of either employed or non-employed.

A resigning employee can agree with their immediate hiring manager that they intend to resign and must stop working today, (for example)

Jan 25<sup>th</sup>, however, considering the employee is ending his/her employment on good terms, the resigning employee is physically involved in the administrative process of his/her employment terminating because the resigning employee must sign his/her signature on the resignation/termination document which legally terminates their employment on any later date scheduled by the employer at the employers convenience; (for example) on Feb 10<sup>th</sup>.

It can be proven to law enforcement by any of a wide array the employing company's offices that the resigning employee is still employed between Jan 25<sup>th</sup> and Feb 10<sup>th</sup> because the employee's resignation/termination document has not been administered yet, even though the resigning employee has not worked since Jan 25<sup>th</sup>.

The resignation/termination document signed on Feb 10<sup>th</sup> can have retroactive effects stating the resigning employee's employment terminated on Jan 25<sup>th</sup> even though it couldn't be proven their employment terminated until Feb 10<sup>th</sup> after the resignation document had been administered. And different company offices could always confirm the resigning employee's employment status is employed up until the day of the administration.

Jonathan A. Brownlee vs Megan's Law

The resigning employee's immediate hiring manager could tell law enforcement that the employee has been terminated if they are asked between Jan 25<sup>th</sup> and Feb 10<sup>th</sup> (only considering their future's agenda) and law enforcement could take the managers word for it without further investigation into viewing documented proof that the resigning employee's employment terminated; then arrest the resigning employee for not registering an employment status change on time.

The Megan's Law registering system must be changed to be fixed or amended to require documented proof an employee's employment terminated.

And, law enforcement investigating and enforcing violations of employment status changes to non-employed for those on Megan's Law must require to see documented proof (the termination/resignation document with a PAST administration date) from an employer that an employee's employment actually terminated (and no other company office can claim differently) before arresting a resigning employee for not registering an employment status change to non-employed on time.

This discrepancy in the Megan's Law registering system requiring a fix/amendment only applies to RESIGNING employees because their employment status could be in question up until the time the employee signs their resignation and other than home employment location company offices will always confirm an employee's employment status is employed until a termination document is administered to the company, while at the same time the immediate manager can tell (law enforcement) that the resigning employee is not employed without documented proof required.

This causes unfair vulnerabilities of false Megan's Law violation charges and unnecessary imprisonment to the resigning employee because they have no way to prove they are not employed until they sign their resignation document.

Jonathan A. Brownlee III vs Megan's Law

In the past, law enforcement assumed I was non-employed when I was legally employed in the process of resigning, then composed and filed a false Megan's Law violation charge against me for not registering an employment status change to non-employed which I was later found Not Guilty of after suffering unnecessary imprisonment for 1 year. And exactly in the same manner described in my Statement of Claim when the events could have been counteracted if the Megan's Law registering system had initially been established properly.

The Megan's Law registering system discrepancy causes State Police to administer Megan's Law registrations in a faulty and improper manner and causes any investigating law enforcement to compose and file false Megan's Law violation charges resulting in unnecessary imprisonment.



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SCRANTON

JUL 18 2018

PER

DEPUTY CLERK

Dear Federal Clerk of Court,

Hello, My name is Jonathan A. Browder Jr.

Very recently, I had you file 2 Pro Se 1983 Civil Rights Violation complaint forms and 2 days ago I have sent to you in separate mailings, 2 additional Pro Se 1983 Civil Rights Violation complaints marked "Part 1" and "Part 2" on the envelope, for filing. I have not yet received confirmation of (your) receipt or assigned case #s for these new/latest complaints. This will make a total of 4 complaints.

I am not an attorney, I am an imprisoned pretrial detainee with no experience in civil litigation, and no resources in my position to find, contact and retain attorneys who can represent me.

If the Federal District Court Judge is able to appoint (free) counsel to represent me for my 4 alleged Civil Rights violations' cases—

(REQUEST #1) Will you please send me the application(s), form(s), or applicable document(s) for me to make that request of the court and/or Judge?

(REQUEST #2) If the request for (free) counsel appointment I would like to make is not possible/applicable to my Civil Rights violation cases, please inform me that it is not, if it is not?

If not, I will continue to pursue justice for my cases Pro Se until their conclusion even if the court/Judge is unwilling to appoint counsel to me.

(REQUEST #3) If possible, will you please send to me, copies of the 2 completed Pro Se 1983 form complaints (for 1:18-CV-1318 AND 1:18-CV-1319) that I have mailed to you for filing including their attached Extra Sheets/Additional Pages for my reference?

(REQUEST #4) And, please send copies of the latest/new additional completed Pro Se 1983 form complaints that I have mailed to you for filing, including their attached Extra Sheets/Additional Pages for my reference which I have not received complaint receipt confirmation yet? A total of, copies of all 4 original completed complaints.



(REQUEST #5) If possible, will you please send to me, posted envelopes to return documentation, if documentation you send to me is required to be returned to you in the future?

(REQUEST #6) If possible, will you please send to me the appropriate documents I would need to serve on M.C.C.F. (Monroe County Correctional Facility) to subpoena/request documents, exculpatory documents (for my immediate reference) filed in their offices, specifically, request slips and grievance forms I've filed while imprisoned there, and send me the appropriate documents to subpoena the police report relating to case # 1:18-CV-1318.

(REQUEST #7) If possible, will you please send to me, example documents of what written motions look like in form?

(REQUEST #8) If possible, will you please send to me, example documents of what written briefs look like in form? — For the purpose of (my) studying their regular form so I am able to compose my own for your court as properly as possible concerning my own cases' matters.

Please be advised; for case # 1:18-CV-1319, I do not believe that I need to serve US Marshals-Service of Process documentation on any other party than the Attorney for the USA, so I will not include that in my reply correspondence to you.

(REQUEST #9) For case # 1:18-CV-1318, will you please serve the appropriate enclosed documentation (Notice of Lawsuit, Summons, Service Waiver and/or Service of Process) on the different parties of my case? — which is Monroe County Correctional Facility Warden? The defendants employed by M.C.C.F. for case # 1:18-CV-1318 are unknown by (me) the Plaintiff until I retain documents that are currently not in my possession which reveal their identities (those documents are Request Slips and Grievance Forms).

Very recently I sent you 2 completed Pro Se 1983 Civil Rights violation complaint forms (for prisoner) for you to file, the case #s for those filings are 1:18-CV-1318, and 1:18-CV-1319.

I believe that you or whoever filed my complaints possibly made an

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error in the filing of the complaint that has been assigned case # 1:18-CV-1319. The reason why I am stating this is because the "30 day administrative order" document included in the correspondence packet (RE: Civil Action # 1:18-CV-1319) I received from you has the caption [sic] Brownlee v. Monroe County Correctional Facility. I believe this may be an unintentional typographical error. I also am pretty sure the person who made the filing intended to input Brownlee v. USA on the document. The document is enclosed with an obvious arrow(s) I drew on the document pointing to the caption and case # for your reference that I believe is the error. Please be informed that I am treating everything involved with case # 1:18-CV-1319 as if it pertains only to the Brownlee v. USA case and therefore not pertaining at all to the Brownlee v. Monroe County Correctional Facility case. You do not need to reply to me to acknowledge this error unless it actually is not an error and the case # 1:18-CV-1319 actually does represent my Brownlee v. MCCF case in addition to case # 1:18-CV-1318 representing my Brownlee v. MCCF case, when both case #s were assumed to be filed v. MCCF and v. USA, filed simultaneously.

(REQUEST #10) If I should have filled out the bottom half remainder of the "Waiver of Service of Summons" documents before returning them to you, please send them back to me to complete them? I believed that the defendant should fill out that area of the documents which is why I left it blank; disregard the request if I was correct. Thank you.

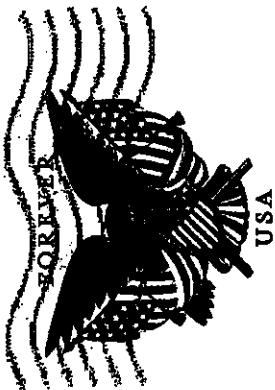
Sincerely,  
Jonathan A. Brownlee

Name: Jonathan A. Bravin, III

Lackawanna County Prison  
1371 N Washington Avenue  
Scranton, PA 18509-2840

RECEIVED MAILER PM BOX

15 JUL 2018 PM 4:1



6/ Clerk of Court (Part I)  
Office of the Clerk  
US District Court  
235 N. Washington Avenue  
P.O. Box 1148  
Scranton, PA 18501-1148

RECEIVED  
SCRANTON

JUL 18 2018

PER Amo DEPUTY CLERK

18501-114848

